

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

**IN RE: WAL-MART WAGE AND HOUR
EMPLOYMENT PRACTICES
LITIGATION**

MDL 1735

**Docket No. 2:06-CV-00225-PMP-PAL
(BASE FILE)**

**THIS DOCUMENT RELATES TO KING
v.
WAL-MART STORES, INC., CASE
NO. 07-1486-WY**

**CO-LEAD COUNSEL CAROLYN BEASLEY BURTON'S JOINDER IN MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION AND FOR
RECOVERY OF ATTORNEYS' FEES AND EXPENSES INCURRED**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT**, on Monday, October 19, 2009, at 11:00 a.m. or as soon
3 there after as the matter may be heard in Courtroom 7C of the United States District Court for the
4 District of Nevada – Las Vegas, located at 333 Las Vegas Blvd. South, Las Vegas, Nevada, Co-Lead
5 Counsel Carolyn Beasley Burton will and hereby does (1) join in Lead Plaintiff's Motion for Final
6 Approval of Class Action Settlement and Plan of Allocation in *King. v. Wal-Mart Stores, et al.*, Case
7 No. 07-1486-WY; (2) request reimbursement of Co Lead Counsel's expenses in the amount of
8 \$21,731.25.
9

10 This Motion is brought pursuant to Rule 23(f) of the Federal Rules of Civil Procedure on the
11 grounds that entry of Final Judgment pursuant to the terms of the Settlement is appropriate, and Co
12 Lead Counsel has incurred attorneys' fees and expenses for which Co-Lead Counsel should be
13 reimbursed from the common fund created as a result of the Settlement. The requested fees are fair and
14 reasonable in light of Co-Lead Counsel's work and obligations under Pre-Trial Order No. 2, and the
15 requested fees comport with Ninth Circuit law in common fund cases. The expenses for which
16 reimbursement is sought were reasonably and necessarily incurred in connection with the prosecution of
17 the *King* case as part of MDL 1735.
18

19 //

20 //

21 //

22 //

23 //

24 //

25 //

1 This Motion is based upon the accompanying declaration of Co-Lead Counsel Carolyn Beasley
2 Burton.

3 Dated: October 5, 2009

Respectfully submitted,

5 /s/ Carolyn Beasley Burton

6 Carolyn Beasley Burton

7 Robert Mills

THE MILLS LAW FIRM

880 Las Gallinas Avenue, Suite 2

San Rafael, CA 94903